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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**
19

20 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
21 LITIGATION

22 _____
23 This Document Relates to:
24 ALL MATTERS
25 _____
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Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF RANDALL S. LUSKEY IN
SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

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DECLARATION OF RANDALL S. LUSKEY

I, Randall S. Luskey, declare pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I am a member in good standing of the Bar of the State of California. I know the following facts to be true of my own knowledge except those matters stated to be based on information and belief.

2. I respectfully submit this declaration in support of Uber’s Administrative Motion to Seal, dated April 7, 2025.

3. I have reviewed the exhibits to my Declaration in Support of Uber’s Motion for Relief from the Nondispositive Pretrial Order of Magistrate Judge Cisneros dated March 24, 2025, Dkt. No. 2600 (the “Motion for Relief”), as well as the Motion for Relief itself.

4. Exhibits 1 and 2 to my declaration consist of the Declarations of Dara Khosrowshahi and Jill Hazelbaker submitted in support of Uber’s Memorandum of Points and Authorities in support of its Motion for a Protective Order, dated February 28, 2025, Dkt. 2425. These Declarations include confidential information about Uber’s internal systems, affairs, organizational structure, and division of responsibilities. Declarations of Mr. Khosrowshahi and Ms. Hazelbaker covering the same subject matter are also under seal in the parallel *In re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”) case against Uber.

5. Exhibit 5 to my declaration consists of excerpts from the March 26–27, 2025 deposition of Henry Gustav Fuldner coordinated between this litigation and the JCCP. The transcripts are designated “Highly Confidential” pursuant to protective orders entered in each proceeding. The March 27, 2025 transcript has not been edited, proofread, corrected, or certified yet.

6. The portions of the Motion for Relief that Uber seeks to redact consist of excerpts from Exhibit 5 to my declaration that are designated “Highly Confidential.”

7. Exhibit 6 to my declaration consists of excerpts from the November 13, 2024 deposition of Matthew Baker taken in the JCCP. Portions of the excerpts are designated “Confidential” pursuant to a protective order entered in that case.

8. Exhibit 7 to my declaration consists of excerpts from the November 19, 2024 deposition of Roger Kaiser taken in the JCCP. Portions of the excerpts are designated “Confidential” pursuant to a protective order entered in that case.

9. Exhibit 8 to my declaration consists of excerpts from the October 15, 2024 deposition of Andi Pimentel taken in the JCCP. Portions of the excerpts are designated “Confidential” pursuant to a protective order entered in that case.

10. The foregoing deposition excerpts contain highly sensitive details about numerous confidential aspects of Uber's business, including: non-public safety features that Uber has considered, developed, or implemented as part of its operations in foreign countries; the processes by which Uber audits and presents various data in its U.S. Safety Reports; the operation of and rationale for employing various background check procedures; Uber's approach to the complex issues surrounding the implementation of certain technological features; Uber's deactivation data and policies; and Uber's executive compensation practices.

11. On information and belief, the foregoing documents contain confidential information about Uber's internal affairs, the public disclosure of which has the potential to harm the interests of both Uber and its employees.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 7, 2025, in San Francisco, California.

/s/ Randall S. Luskey
Randall S. Luskey